

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

| | | |
|--------------------------|---|---------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | Criminal No. 05-10083-JLT |
| |) | |
| DWAYNE THOMAS |) | |

GOVERNMENT'S §5K1.1 DOWNWARD DEPARTURE
MOTION BASED UPON SUBSTANTIAL ASSISTANCE

The United States hereby moves the Court, pursuant to U.S.S.G. §5K1.1, for a downward departure from the applicable sentencing guideline range for the sentencing of Defendant Dwayne Thomas, based upon the substantial assistance he provided to the government.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Adam Bookbinder
ADAM J. BOOKBINDER
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I certify that this document filed through the ECF system, which will provide electronic notice to counsel as identified on the Notice of Electronic Filing.

/s/ Adam J. Bookbinder
Adam J. Bookbinder

Dated: March 7, 2007